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9  
10 Attorneys for Plaintiff  
11 United States of America

12  
13 IN THE UNITED STATES DISTRICT COURT  
14  
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,  
17 Plaintiff,  
18 v.  
19 JORGE CALDERON-CAMPOS,  
20 BYRON ADILIO ALFARO-SANDOVAL,  
21 JOSE ANGEL BELTRAN-CHAIDEZ, AND  
22 MARK GARCIA,  
23 Defendants.

24 UNITED STATES OF AMERICA,  
25 Plaintiff,  
26 v.  
27 JORGE CALDERON-CAMPOS,  
28 Defendant.

10 CASE NO. 1:22-CR-00131-JLT-SKO  
11  
12 STIPULATION REGARDING EXCLUDABLE  
13 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
14 ORDER

15 DATE: September 20, 2023  
16 TIME: 1:00 p.m.  
17 COURT: Hon. Magistrate Judge Sheila K. Oberto

18 CASE NO. 1:22-CR-00130-JLT-SKO  
19  
20 STIPULATION REGARDING EXCLUDABLE  
21 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
22 ORDER

23 DATE: September 20, 2023  
24 TIME: 1:00 p.m.  
25 COURT: Hon. Magistrate Judge Sheila K. Oberto

26  
27  
28 **STIPULATION**

29 Plaintiff United States of America, by and through its counsel of record, and defendants, by and  
30 through defendants' counsel of record, hereby stipulate as follows:

31 1. By previous order, these matters were scheduled for a status conference on September 20,  
32 2023, before U.S. Magistrate Judge Sheila K. Oberto. On September 7, 2023, the Court also directed the  
33 parties to set a trial date.

1       2.     On September 7, 2023, Monica Bermudez entered her appearance as counsel for  
2 defendant Jose Angel Beltran-Chaidez. His former attorney withdrew following the government's  
3 motion of a potential conflict of interest based on the joint representation of Beltran-Chaidez and  
4 Defendant Calderon-Campos by two members of the same law firm.

5       3.     In light of Ms. Bermudez's need to review discovery and have meaningful discussions  
6 with her client and the government regarding a potential disposition, by this stipulation, the parties  
7 request one last continuance in this matter. It is requested that the status conference currently set for  
8 September 20, 2023, be continued to December 6, 2023, before U.S. Magistrate Sheila K. Oberto, or the  
9 Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between  
10 September 20, 2023, and December 6, 2023. On December 6, 2023, the parties will set the matter for  
11 trial or, in the alternative, enter into a plea agreement.

12      4.     Further, Daniel Harralson and his client, Antonio Beltran-Chaidez, are relatively new to  
13 the case, having initially appeared on July 11, 2023.

14      5.     The parties agree and stipulate, and request that the Court find the following:

15       a)     1,656 pages of Bates-stamped material has been provided to the defense in this  
16 matter. This material consists primarily of wiretap intercepts and data, reports of investigation,  
17 photographs, recordings of post-arrest interviews, and defendants' criminal histories.

18       b)     Plea offers have been made to all of the defendants.

19       c)     Counsel for defendants desire additional time to review discovery, consult with  
20 their clients, conduct investigation and research related to the charges, consider plea offers,  
21 engage in plea negotiations, and to otherwise prepare for trial.

22       d)     Counsel for defendants believe that failure to grant the above-requested  
23 continuance would deny them the reasonable time necessary for effective preparation, taking into  
24 account the exercise of due diligence.

25       e)     Based on the above-stated findings, the ends of justice served by continuing the  
26 case as requested outweigh the interest of the public and the defendants in a trial within the  
27 original date prescribed by the Speedy Trial Act.

28       f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,

1       *et seq.*, within which trial must commence, the time period of September 20, 2023 to December  
2       6, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it  
3       results from a continuance granted by the Court at the defendants' request on the basis of the  
4       Court's finding that the ends of justice served by taking such action outweigh the best interest of  
5       the public and the defendants in a speedy trial.

6       6.       Nothing in this stipulation and order shall preclude a finding that other provisions of the  
7       Speedy Trial Act provide that additional time periods are excludable from the period within which a trial  
8       must commence.

9       IT IS SO STIPULATED.

10      Dated: September 7, 2023

PHILLIP A. TALBERT  
United States Attorney

15      /s/ DAVID A. TORRES  
16      DAVID A. TORRES  
Counsel for defendant Jorge Calderon-Campos

13      /s/ KAREN A. ESCOBAR  
14      KAREN A. ESCOBAR  
Assistant United States Attorney

19      /s/ MONICA BERMUDEZ  
20      MONICA BERMUDEZ  
Counsel for defendant Jose Angel Beltran-  
21      Chaidez

17      /s/ FATIMA RODRIGUEZ  
18      FATIMA RODRIGUEZ  
Counsel for defendant Byron Adilio Alfaro-  
22      Sandoval

25      IT IS SO ORDERED.

27      DATED:      9/8/2023

24      ORDER

26      Sheila K. Oberto

27      THE HONORABLE SHEILA K. OBERTO  
28      UNITED STATES MAGISTRATE JUDGE